

**IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN
DISTRICT OF GEORGIA ATLANTA DIVISION**

DONNA CURLING, *et al.*

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants.

CIVIL ACTION

FILE NO. 1:17-CV-2989-AT

Plaintiffs' Offered Deposition Designations and Corresponding Exhibits

Key to Plaintiffs' Objections

Code	Counter Objection
ARG	Lawyer Argument or Colloquy. Plaintiffs object to this deposition designation because it is lawyer argument and not testimony of the witness.
CM	Cumulative. Plaintiffs object to this deposition designation on the ground that it is duplicative and/or cumulative of other designations.
F	Foundation. Plaintiffs object to this deposition designation on the ground that the foundation necessary for its admission has not been laid. (Fed. R. Evid. 602)
H	Hearsay. Plaintiffs object to this deposition designation because it constitutes or contains hearsay. (Fed. R. Evid. 801-802)
I	Incomplete. Plaintiffs object to this deposition designation because it does not contain the complete testimony. (Fed. R. Evid. 106) Plaintiffs generally objects to all designations that include only part of a question and/or part of an answer, or that do not include any question.
NR	Not Relevant. Plaintiffs object to this deposition designation because it is not relevant to any issue to be decided in this case. (Fed. R. Evid. 401-402)
LO	Lay Opinion. Plaintiffs object to this deposition designation because it constitutes or contains improper opinion by a lay witness. (Fed. R. Evid. 701-702)
NRT	Non-Responsive Testimony. Plaintiffs object to this deposition designation because it includes statements that are not responsive to the question asked.
S	Speculative. Plaintiffs object to this deposition designation because it includes statements that are speculative as to matters of fact or law.
SCOPE	Beyond Scope of Affirmative Designation. Plaintiffs object to this counter designation because it is beyond the scope of the original, affirmative deposition designation.
403	F.R.E 403. Plaintiffs object to this deposition designation because any probative value it has is substantially outweighed by a danger of one or more of the following: unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence. (Fed. R. Evid. 403)
VA	Vague and Ambiguous. Plaintiffs object to this deposition designation because it includes vague and indefinite statements.
P	Privilege Objection. Plaintiffs object to this designation because it includes privilege objections or attempts to solicit privileged information.
L	Leading. Plaintiffs object as an improper leading question.
COM	Compound. The question is compound and thus not clear which question the deponent is answering.
BE	Best Evidence. Plaintiffs object to this question because it asks a witness to testify about the contents of an original writing, recording, or photograph where the original is available. (F.R.E 1002)
LEGAL	Plaintiffs object to this question because it calls for a legal conclusion.

Designations for Deposition of David Hamilton, Feb. 18, 2022

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Plaintiffs' Objections to Counters
9:9-9:12			
12:6-12:17			
15:12-15:24	Relevance, F.R.E. 401		
16:2-16:4	Relevance, F.R.E. 401		
16:10-16:24	Relevance, F.R.E. 401		
19:14-19:17			
20:7-20:11			
21:21-22:19			
23:25-27:5			
27:6-27:11			
28:2-28:4			
28:17-29:13			
32:1-32:16			
35:5-36:13			
45:8-46:7			
46:8-46:11			
47:19-48:22			
48:23-49:12			
53:7-54:2			
58:17-59:9			
59:13-59:16			
59:19-59:19			
60:22-62:4			
62:5-63:5			
63:23-64:9			
64:14-64:24			
65:13-65:14			
68:13-70:9	Relevance, F.R.E. 401		
72:25-74:12			
97:5-97:10	Legal conclusion		
97:14-97:16			
97:18-97:20			
97:22-98:2	Relevance, F.R.E. 401		
98:4-98:4	Relevance, F.R.E. 401		
98:6-98:9			
98:11-98:13			
106:25-107:15			
116:19-118:4			
121:14-125:6			
125:10-127:15			
127:18-128:7			
128:10-129:5			

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Plaintiffs' Objections to Counters
158:22-158:23	Relevance, F.R.E. 401		
159:4-165:5	Relevance, F.R.E. 401		
176:12-176:13	Relevance, F.R.E. 401		
176:19-176:20	Relevance, F.R.E. 401		
177:5-179:4	Relevance, F.R.E. 401		
179:6-179:7			
179:15-180:1			
181:21-182:11	Relevance, F.R.E. 401		
183:4-183:12	Relevance, F.R.E. 401		
183:16-183:16	Relevance, F.R.E. 401		
183:18-183:20	Relevance, F.R.E. 401		
183:22-184:4	Relevance, F.R.E. 401		
184:8-184:8		50:8-51:15	NR, NRT
184:11-184:12		59:21-60:17	NR, NRT
184:15-184:17		63:6-22	NR, NRT
184:19-184:20		200:24-202:14	NR, NRT
185:5-185:8			
185:11-185:11			
185:13-185:15	Seeks inadmissible opinion testimony; irrelevant		
185:18-185:20	Seeks inadmissible opinion testimony; irrelevant		
186:3-186:5			
186:8-186:14			
188:3-188:7	Seeks inadmissible opinion testimony; irrelevant		
189:5-189:11			
190:21-190:23			
191:1-191:2			
191:4-191:5			
191:9-191:13			
191:19-191:22			
192:2-192:5			
192:8-192:8			
193:10-193:16			
193:18-193:19			
193:22-194:1			
194:5-194:10			
194:13-194:22			
194:25-195:11			
195:14-196:3			
196:5-196:5			
196:13-197:4			

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Objections to Counters
197:22-198:2			
198:4-198:4			
198:13-198:17			

Designations for Deposition of Merritt Beaver (30(b)(6)), Feb. 2, 2022

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Plaintiffs' Objections to Counters
9:12-9:14		14:16-16:12	NR, NRT
9:21-10:5		16:21-17:5	NR, NRT
16:13-16:20		21:10-20	NR, NRT
20:6-21:9		45:1-46:15	NR, NRT
23:1-23:4		83:19-84:8	NR, NRT
23:6-23:9			
26:1-26:13			
26:14-27:15			
30:6-30:8			
30:10-30:23			
36:24-37:11			
37:14-37:18			
40:17-40:21			
40:22-41:1			
41:13-42:12			
42:13-42:18			
43:10-43:21			
44:6-44:13			
48:6-48:25			
49:1-50:13			
50:14-50:25			
74:6-74:10			
75:4-75:9			
83:8-83:14			
91:5-91:14		91:15-24	NR, NRT
91:25-92:4	Lack of foundation, speculation, F.R.E. 602	92:6-10	NR, NRT
92:6-92:10	Lack of foundation, speculation, F.R.E. 602	91:25-92:4	NR, NRT
133:7-133:10	Lack of foundation, speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	133:12-133:12	NR, NRT
133:12-133:18	Defendants object because the cited portion is incomplete, F.R.E. 106; Lack of foundation, speculation, F.R.E. 602; No tendency to make any fact more or less probable and		

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Plaintiffs' Objections to Counters
	the fact is not of consequence in determining the case, F.R.E. 401.		
133:20-134:7	Lack of foundation, speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
134:8-134:14	Lack of foundation, speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
170:18-172:24	Contains hearsay, F.R.E 801, 802; not relevant, F.R.E 401; lack of foundation, F.R.E 602; incomplete, F.R.E 106; vague and unclear.		
172:19-172:22	Contains hearsay, F.R.E 801, 802; not relevant, F.R.E 401; lack of foundation, calls for speculation, F.R.E 602; incomplete, F.R.E 106; vague and unclear	172:24-172:24	NR, NRT
172:24-172:24	Incomplete, F.R.E 106; vague and unclear context; lack of foundation/speculation, F.R.E 602		
174:24-175:4	Contains hearsay, F.R.E 801, 802; incomplete because the excerpt contains a question, to which there was an objection, without the answer, F.R.E 106; lack of foundation, F.R.E 602; vague, unclear context; not relevant, F.R.E 401; outside the scope of the 30b6 topics assigned to this witness		
175:6-175:13	Incomplete because the excerpt contains an answer without a question, to which there was an objection, F.R.E 106; excerpt is incomplete answer, F.R.E 106; vague, unclear context; not		

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Plaintiffs' Objections to Counters
	relevant, F.R.E 401; speculative, F.R.E 602; outside the scope of the 30b6 topics assigned to this witness		
175:14-175:22	Incomplete because the excerpt contains an answer without a question, to which there was an objection, F.R.E 106; excerpt is incomplete answer, F.R.E 106; vague, unclear context; not relevant, F.R.E 401; speculative, F.R.E 602; outside the scope of the 30b6 topics assigned to this witness		
176:4-176:21	Incomplete because the excerpt contains an answer without a question, to which there was an objection, F.R.E 106; excerpt is incomplete answer, F.R.E 106; vague, unclear context; not relevant, F.R.E 401; speculative, F.R.E 602; outside the scope of the 30b6 topics assigned to this witness		
181:14-181:18	Incomplete, F.R.E 106; vague, unclear context; not relevant, F.R.E 401; lack of foundation/calls for speculation, F.R.E 602; contains hearsay, F.R.E 801, 802; contains improper legal conclusion, F.R.E 701; outside the scope of the 30b6 topics assigned to this witness		
181:20-182:7	Incomplete, F.R.E 106; vague, unclear context; not relevant, F.R.E 401; lack of foundation, F.R.E 602; outside the scope of the 30b6 topics assigned to this witness		
182:8-182:15	Incomplete, F.R.E 106; vague, unclear context; not relevant, F.R.E 401; lack of foundation, F.R.E 602; outside the scope of the 30b6 topics assigned to this witness		
183:2-184:18	Objection, outside the scope of the 30b6 topics assigned to this witness		
192:16-193:6	Incomplete, F.R.E 106; vague, unclear context; not relevant, F.R.E 401; lack of foundation, F.R.E 602; contains hearsay, F.R.E 801, 802; outside the scope of the 30b6 topics assigned to this witness		

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Plaintiffs' Objections to Counters
194:17-194:20	F.R.E 401 - Not relevant; outside the scope of the 30b6 topics assigned to this witness		
195:1-195:25	Incomplete, F.R.E 106; not relevant, F.R.E 401; outside the scope of the 30b6 topics assigned to this witness		
197:9-197:14	Incomplete, F.R.E 106; not relevant, F.R.E 401; outside the scope of the 30b6 topics assigned to this witness		
197:16-197:18	Incomplete, F.R.E 106; not relevant, F.R.E 401; outside the scope of the 30b6 topics assigned to this witness		
197:19-198:1	Incomplete, F.R.E 106; not relevant, F.R.E 401; vague/unclear context; outside the scope of the 30b6 topics assigned to this witness		
245:17-245:25	Relevance, F.R.E. 401		
246:1-246:15	Lack of foundation/speculation, F.R.E. 602		
246:16-247:8	Relevance, F.R.E. 401		

Designations for Deposition of Merritt Beaver (30(b)(6) , March 10, 2022

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Plaintiffs' Objections to Counters
275:11-275:16	Relevance, F.R.E. 401; Hearsay F.R.E 801.		
275:17-276:4	Lack of foundation/speculation, F.R.E. 602; Hearsay F.R.E 801.		
276:5-276:9	Relevance, F.R.E. 401; Hearsay F.R.E 801.		
276:10-277:6	Lack of foundation/speculation, F.R.E. 602; Hearsay F.R.E 801.		
283:2-284:1	Lack of foundation/speculation, F.R.E. 602; Hearsay F.R.E 801.		
284:3-285:20	Lack of foundation/speculation, F.R.E. 602; Hearsay F.R.E 801; Seeks a legal conclusion F.R.E. 701		
289:17-293:2	Lack of foundation/speculation, F.R.E. 602; Hearsay F.R.E 801; Designation contains incomplete answer. F.R.E. 106.		
293:5-294:21	Hearsay F.R.E 801		
295:1-295:5	Relevance, F.R.E. 401		
308:4-309:14	Lack of foundation/speculation, F.R.E. 602; Hearsay F.R.E 801; Seeks a legal conclusion F.R.E. 701		
311:16-312:6	Lack of foundation/speculation, F.R.E. 602; Hearsay F.R.E 801; Unauthenticated document		
313:3-313:13	Lack of foundation/speculation, F.R.E. 602; Hearsay F.R.E 801		
314:20-317:16	Lack of foundation/speculation, F.R.E. 602; Hearsay F.R.E 801; Seeks a legal conclusion F.R.E. 701		
321:5-321:13	Seeks opinion on ultimate		

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Plaintiffs' Objections to Counters
	issue F.R.E. 704		
327:1-327:16	Lack of foundation/speculation, F.R.E. 602		
327:17-328:20	Seeks opinion on ultimate issue F.R.E. 704; Hearsay F.R.E 801		
328:22-329:9	Seeks opinion on ultimate issue F.R.E. 704; Hearsay F.R.E 801		
329:11-330:16	Seeks opinion on ultimate issue F.R.E. 704; Seeks a legal conclusion F.R.E. 701		
331:17-332:4	Lack of foundation/speculation, F.R.E. 602		
332:12-332:23	Lack of foundation/speculation, F.R.E. 602; Hearsay F.R.E 801; Unauthenticated document		
339:9-339:11	Lack of foundation/speculation, F.R.E. 602; Hearsay F.R.E 801; Unauthenticated document		
339:13-340:4	Lack of foundation/speculation, F.R.E. 602; Hearsay F.R.E 801; Unauthenticated document		
344:6-345:2	Lack of foundation/speculation, F.R.E. 602; Hearsay F.R.E 801; Unauthenticated document		
345:6-345:15	Lack of foundation/speculation, F.R.E. 602; Hearsay F.R.E 801; Unauthenticated document		
345:18-346:13	Lack of foundation/speculation, F.R.E. 602; Hearsay F.R.E 801; Unauthenticated document		
352:13-353:19	Lack of foundation/speculation, F.R.E. 602; Hearsay F.R.E 801; Unauthenticated document		
375:20-375:24			
376:1-376:22	Lack of foundation/speculation, F.R.E.		

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Plaintiffs' Objections to Counters
	602; Hearsay F.R.E 801; unauthenticated document		
379:25-380:19	Lack of foundation/speculation, F.R.E. 602; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	379:20-380:19.	NR, NRT
396:13-397:7	Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
401:17-402:12	Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
402:13-402:24	F.R.E 602 –lack of foundation, speculation		
403:17-403:21	F.R.E 602 –lack of foundation, speculation; Improper legal conclusion, F.R.E 701; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	403:17-403:24.	NR, NRT
403:25-404:7	F.R.E 602 –lack of foundation, speculation; Improper legal conclusion, F.R.E 701; the cited portion reflects an incomplete statement.	403:22-404:18.	NR, NRT
404:15-404:17	Designation contains incomplete answer. Designation contains statement from counsel and not testimony of the witness. Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	403:22-404:18.	NR, NRT
404:19-404:24	F.R.E 602 –lack of foundation; F.R.E 704- Seeks		

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Plaintiffs' Objections to Counters
	opinion on ultimate issue		
407:3-407:6	F.R.E 602 –lack of foundation, speculation; Improper legal conclusion, F.R.E 701; F.R.E 704- Seeks opinion on ultimate issue	407:2-407:7	NR, NRT
407:8-408:17	F.R.E 602 –lack of foundation, speculation; Improper legal conclusion, F.R.E 701; F.R.E 704- Seeks opinion on ultimate issue; the cited portion reflects an incomplete statement; and hearsay, F.R.E. 801	407:7-409:5	NR, NRT
408:19-409:5	F.R.E 704- Seeks opinion on ultimate issue;		
409:12-410:5	No objection		
410:7-410:12	No objection		
412:2-412:7	No objection		
413:12-413:15	Designation contains incomplete answer. Designation contains statement from counsel and not testimony of the witness. Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	413:16 - 413:19	NR, NRT
413:16-413:19	Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	413:12 - 413:15	NR, NRT
413:20-413:21	No objection		
414:3-415:4	Relevance, F.R.E. 401.		
415:17-417:15	Lack of foundation/speculation, F.R.E. 602; Hearsay, F.R.E. 801; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
418:19-420:5	No objection		
420:6-420:18	No objection		
427:16-427:19	No objection		

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Plaintiffs' Objections to Counters
427:21-428:20	No objection		

Designations for Deposition of Gabriel Sterling(30(b)(6)), Feb. 24, 2022

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Objections to Counters
8:10-8:16	Witness and counsel introductions are not relevant (F.R.E 403), and if relevant, probative value outweighed by waste of time (F.R.E 401)		
8:20-9:3	Background and definition of 30b6 testimony is not relevant (F.R.E 403), and if relevant, probative value outweighed by waste of time (F.R.E 401)		
9:8-9:9	the cited portion reflects an incomplete statement		
9:11-9:11	Not relevant (F.R.E 403), and if relevant, probative value outweighed by waste of time (F.R.E 401)		
10:19-11:7	Not relevant (F.R.E 403), and if relevant, probative value outweighed by waste of time (F.R.E 401)		
11:15-11:20	Not relevant (F.R.E 403), and if relevant, probative value outweighed by waste of time (F.R.E 401)		
11:22-12:6	Not relevant (F.R.E 403), and if relevant, probative value outweighed by waste of time (F.R.E 401)		
12:15-12:23	Not relevant (F.R.E 403), and if relevant, probative value outweighed by waste of time (F.R.E 401)		
20:19-21:5	Relevance (F.R.E 401), Lack of Foundation/Speculation (F.R.E 602), Beyond Scope of 30b6 (F.R.E 611)		
29:20-30:3	F.R.E 602 - lack of foundation/speculation		
32:4-32:10	F.R.E 602 - lack of foundation/speculation		
34:22-35:6	F.R.E 602 - lack of foundation/speculation; Designation contains statement	34:22-36:22.	NR, NRT

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Objections to Counters
	from counsel and not testimony of the witness.		
35:8-36:6	F.R.E 602 - lack of foundation/speculation; Designation contains statement from counsel and not testimony of the witness.	34:22-36:22.	NR, NRT
38:1-38:5	F.R.E 602 - lack of foundation/speculation	35:17-36:22	NR, NRT
38:9-38:24	No objection		
38:25-39:11	No objection		
40:1-40:9	F.R.E 602 - lack of foundation/speculation; Designation contains statement from counsel and not testimony of the witness.	40:1-40:10	NR, NRT
40:11-41:9	the cited portion reflects an incomplete statement; F.R.E 602 - lack of foundation/speculation	40:11-41:19	NR, NRT
41:21-41:24	No objection	41:14-19, 41:25-43:13	NR, NRT
46:20-47:14	F.R.E 401 - Irrelevant	46:20-47:6	NR, NRT
49:9-49:13	F.R.E 602 - lack of foundation/speculation		
55:9-55:12	No objection		
56:4-56:12	No objection		
56:13-56:23	F.R.E 602 - lack of foundation/speculation; Designation contains statement from counsel and not testimony of the witness.		
56:24-57:16	No objection	57:17-20	NR, NRT
58:9-58:19	No objection	58:20-59:23	NR, NRT
59:24-60:5	No objection	58:20-59:23	NR, NRT
60:15-61:19	Designation contains statement from counsel and not testimony of the witness; F.R.E 602 - lack of foundation/speculation; F.R.E 704- Seeks opinion on ultimate issue;	60:15-61:23	NR, NRT
65:3-66:10	No objection	66:11-12	NR, NRT
66:13-66:21	No objection		
66:24-67:9	No objection	67:11-18	NR, NRT
67:10-67:18	F.R.E 602 - lack of foundation/speculation; the cited portion reflects an incomplete	66:22-67:18	NR, NRT

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Objections to Counters
	statement		
67:19-68:2			
68:17-69:1			
69:2-69:7		69:8-15	NR, NRT
71:6-72:7	F.R.E 611(a) - Question is argumentative		
76:18-77:5	F.R.E 401 - Irrelevant		
78:15-79:15	F.R.E 401 - Irrelevant		
80:8-80:21	F.R.E 401 - Irrelevant		
80:22-81:14	F.R.E 401 - Irrelevant		
81:23-82:8	F.R.E 602 - lack of foundation/speculation		
82:9-83:8	F.R.E 602 - lack of foundation/speculation		
83:10-83:19	F.R.E 602 - lack of foundation/speculation		
83:21-84:1	F.R.E 602 - lack of foundation/speculation		
84:5-85:11	F.R.E 602 - lack of foundation/speculation		
85:21-86:10	F.R.E 602 - lack of foundation/speculation	86:12-87:4	NR, NRT
86:12-86:20	F.R.E 602 - lack of foundation/speculation	86:12-87:4	NR, NRT
87:6-87:9			
87:10-87:16			
88:9-89:2	Defendants object because the cited portion is incomplete, F.R.E. 106; Lack of foundation, speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.	89:4-90:19	NR, NRT
89:4-89:4	Defendants object because the cited portion is incomplete, F.R.E. 106; Lack of foundation, speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.	89:4-90:19	NR, NRT
90:20-91:19	Lack of foundation, speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence	91:20-92:19	NR, NRT

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Objections to Counters
	in determining the case, F.R.E. 401.		
92:24-93:13	Lack of foundation, speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.	91:20-92:19	NR, NRT
96:9-97:9	Lack of foundation, speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.		
97:13-97:22	Defendants object because the cited portion is incomplete, F.R.E. 106	97:23-98:19	NR, NRT
98:20-100:15	Lack of foundation/speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.	97:23-98:19	NR, NRT
100:18-101:16	Lack of foundation/speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.		
101:17-101:23	Incomplete, F.R.E 106; vague, unclear context; not relevant, F.R.E 401; lack of foundation/calls for speculation, F.R.E 602; contains hearsay, F.R.E 801, 802; contains improper legal conclusion, F.R.E 701; outside the scope of the 30b6 topics assigned to this witness	101:24-102:8	NR, NRT
102:21-102:23			
103:15-103:25		103:25-104:9	NR, NRT
103:25-104:9			
104:10-104:22			
104:23-105:4	Lack of foundation/speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E.	105:12-106:1	NR, NRT

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Objections to Counters
	401.		
105:5-105:11	Lack of foundation/speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.	105:12-106:1	NR, NRT
106:2-106:11	Lack of foundation/speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.		
106:22-107:14	F.R.E 401 - Irrelevant		
107:22-108:21	F.R.E 401 - Irrelevant	108:25-109:21	NR, NRT
108:25-109:12	F.R.E 401 - Irrelevant	109:13-109:21	NR, NRT
109:25-110:8	Lack of foundation/speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.		
110:13-111:17	Lack of foundation/speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.	111:18-112:4	NR, NRT
111:8-111:17	Lack of foundation/speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.	111:18-112:4	NR, NRT
112:8-113:7	Lack of foundation/speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; hearsay, F.R.E 801, 802.		
115:1-115:12	Objection that this is cumulative questions and testimony to that provided in Court.		
116:7-117:11		117:9-14	NR, NRT
118:7-120:8			
120:17-120:20			
122:2-122:14			

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Objections to Counters
123:20-124:1			
124:2-124:16			
124:17-125:11	Lack of foundation/speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; hearsay, F.R.E 801, 802.	125:12-21	NR, NRT
126:4-126:11	Lack of foundation/speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; hearsay, F.R.E 801, 802.		
129:21-130:15		130:16-17	NR, NRT
130:16-133:7		130:7-17	NR, NRT
133:17-134:12		134:13-135:16	NR, NRT
138:15-138:24	Lack of foundation/speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; Irrelevant..		
139:7-139:13	Lack of foundation/speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; Irrelevant.		
139:18-139:20	Lack of foundation/speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; Irrelevant.		
139:22-139:22	Lack of foundation/speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; Irrelevant.		
139:24-140:1	Lack of foundation/speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; Irrelevant.		

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Objections to Counters
141:6-141:19	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401.		
142:18-143:21	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401.		
143:22-144:1	Lack of foundation/speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; Irrelevant; Contains hearsay, F.R.E 801, 802.		
144:3-144:6	Lack of foundation/speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; Irrelevant; Contains hearsay, F.R.E 801, 802.		
145:3-145:6	Lack of foundation/speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; Irrelevant; Contains hearsay, F.R.E 801, 802.		
145:15-146:24	Lack of foundation/speculation, F.R.E. 602.		
149:22-150:3	Lack of foundation/speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; Irrelevant; Contains hearsay, F.R.E 801, 802.		
150:6-150:9	Lack of foundation/speculation, F.R.E. 602; No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; Irrelevant; Contains hearsay, F.R.E 801, 802.		
152:7-152:19	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401.		
152:20-154:1	Lack of foundation/speculation,		

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Objections to Counters
	F.R.E. 602; Relevance, F.R.E. 401.		
154:7-154:8			
154:18-154:22			
154:23-155:4			
156:1-157:18	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401.		
158:1-160:4			
169:23-171:16	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401.		
171:17-172:18		172:19-173:2	NR, NRT
173:3-174:13	Object to the extent the question calls for attorney- client communication. F.R.E. 502		
175:6-175:15			
175:17-176:4	Designation contains incomplete answer. F.R.E. 106; Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401		
176:6-176:25	Object on the grounds that it contains lawyers argument and not testimony of the witness; Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
177:2-177:7			
177:9-177:13	Designation contains incomplete answer. F.R.E. 106; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Calls for a legal conclusion.		
177:14-178:6	Designation contains incomplete answer. F.R.E. 106; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
178:8-178:8	Incomplete statement, F.R.E 106;		

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Objections to Counters
	Lack of foundation/speculation, F.R.E. 602; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
178:10-178:15	Incomplete statement, F.R.E. 106; Lack of foundation/speculation, F.R.E. 602; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
178:17-179:14			
179:18-180:8			
182:22-184:12	Lack of foundation/speculation, F.R.E. 602; Designation contains incomplete answer. F.R.E. 106; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	184:13-16	NR, NRT
185:11-187:3	Lack of foundation/speculation, F.R.E. 602; Designation contains incomplete answer. F.R.E. 106; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Defendants further object that this is cumulative questions and testimony to that provided in Court.		
187:5-187:9	Lack of foundation/speculation, F.R.E. 602; Designation contains incomplete answer. F.R.E. 106; Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Defendants further object that this is cumulative questions and testimony to that provided in Court.		
192:17-192:23	Lack of foundation/speculation, F.R.E. 602; Designation contains incomplete answer. F.R.E. 106;		

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Objections to Counters
	Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
193:3-194:9	Object on the grounds that it contains lawyers argument and not testimony of the witness; Lack of foundation/speculation, F.R.E. 602; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
194:10-194:22	Lack of foundation/speculation, F.R.E. 602; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
194:23-197:10	Lack of foundation/speculation, F.R.E. 602; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	197:16-198:8	
197:10-197:23	Lack of foundation/speculation, F.R.E. 602; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	197:16-198:8	
199:12-199:23	Objection that this is cumulative questions and testimony to that provided in Court.	199:24-200:5	
200:6-200:10	Incomplete statement, F.R.E 106; Lack of foundation/speculation, F.R.E. 602; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; calls for a legal conclusion, F.R.E 701. Objection that this is cumulative questions and testimony to that provided in Court.	199:24-200:5	
200:22-201:6	Objection that this is cumulative questions and testimony to that		

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Objections to Counters
	provided in Court.		
201:20-202:6	Lack of foundation/speculation, F.R.E. 602; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
202:7-202:19	Incomplete statement, F.R.E 106; Lack of foundation/speculation, F.R.E. 602; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	202:20-203:7	NR, NRT
203:8-203:14	Incomplete statement, F.R.E 106; Lack of foundation/speculation, F.R.E. 602; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	203:15-24	NR, NRT
211:13-212:3	Incomplete statement, F.R.E 106; Lack of foundation/speculation, F.R.E. 602; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	212:4-18	NR, NRT
212:19-212:22	Incomplete statement, F.R.E 106; Lack of foundation/speculation, F.R.E. 602; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	212:4-18	NR, NRT
214:3-214:5			
214:11-215:10	Incomplete statement, F.R.E 106; Lack of foundation/speculation, F.R.E. 602; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	215:11-23	NR, NRT
219:17-220:2	Incomplete statement, F.R.E 106; Lack of foundation/speculation, F.R.E. 602; further object on the grounds that its reception would	220:3-15	NR, NRT

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Objections to Counters
	be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
220:16-220:21	Incomplete statement, F.R.E 106; Lack of foundation/speculation, F.R.E. 602; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; Hearsay.	220:3-15	NR, NRT
220:22-220:25	Incomplete statement, F.R.E 106; Lack of foundation/speculation, F.R.E. 602; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
223:12-223:20	Designation contains incomplete answer, F.R.E 106; Designation contains statement from counsel and not testimony of the witness.		
223:25-223:25	Designation contains incomplete answer. F.R.E 106.		
224:4-224:12	Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
224:13-226:23	Object on the grounds that it contains lawyers argument and not testimony of the witness; Lack of foundation/speculation, F.R.E. 602; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
226:25-227:1	Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
230:19-233:12	Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
233:17-236:5	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401; further object on the grounds	236:6-17	NR, NRT

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Objections to Counters
	that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
244:24-245:5	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401	243:15-244:23; 245:06-245:10	NR, NRT
250:10-250:12	Object on the grounds that it contains lawyers argument and not testimony of the witness; Lack of foundation/speculation, F.R.E. 602	245:21-247:08	NR, NRT
250:17-251:18	Lack of foundation/speculation, F.R.E. 602; cumulative testimony F.R.E 403		
253:9-253:14	Object on the grounds that it contains lawyers argument and not testimony of the witness; counsel not competent to testify		
253:16-254:11	Vague, F.R.E 611	254:12-17	NR, NRT
254:18-254:23	Vague, F.R.E 611	254:12-17	NR, NRT
255:10-256:1		256:2-12	NR, NRT
257:1-257:5	Failure to disclose exhibit in discovery FRCP 37(c); exhibit unauthenticated	257:10-12	NR, NRT
257:17-258:5	Failure to disclose exhibit in discovery FRCP 37(c); exhibit unauthenticated		
258:5-259:5	Failure to disclose exhibit in discovery FRCP 37(c); exhibit unauthenticated; Confusing, Misleading, and unintelligible (F.R.E 403611(a)), Lack of Foundation/Speculation (F.R.E 602), lack of foundation (F.R.E 901), Compound Question (F.R.E 403, 611(a)), Relevance		
259:6-259:16	Failure to disclose exhibit in discovery FRCP 37(c); exhibit unauthenticated; Confusing, Misleading, and unintelligible (F.R.E 403611(a)), Lack of Foundation/Speculation (F.R.E 602), lack of foundation (F.R.E 901), Compound Question (F.R.E 403, 611(a)), Relevance (F.R.E 401), Beyond Scope of 30b6		

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter- Designations	Plaintiffs' Objections to Counters
	(F.R.E 611) Ambiguous, Vague, Unintelligible (F.R.E 403,611(a)),		
259:23-260:5		261:25-262:18	NR, NRT
263:19-263:21	Calls for speculation/lack of foundation F.R.E 602		
263:22-263:25	Calls for speculation/lack of foundation F.R.E 602	264:1-10	NR, NRT
264:11-265:4	Calls for speculation/lack of foundation F.R.E 602; vague F.R.E 611	264:1-10; 265:23-268:10	NR, NRT
329:15-329:25	Calls for improper opinion testimony 701-703	326:22-329:1	NR, NRT
330:9-330:16	Calls for improper opinion testimony 701-703; lack of foundation F.R.E 602	330:18-330:25	NR, NRT
331:1-331:5	Calls for improper opinion testimony 701-703; lack of foundation/speculation F.R.E 602	331:7-14	NR, NRT
335:16-336:16	irrelevant; cumulative, F.R.E 403		
340:6-340:17	irrelevant; cumulative, F.R.E 403	339:14-340:05	NR, NRT
341:12-342:7	irrelevant; cumulative, F.R.E 403		
343:5-343:15	Confusing, Misleading, and unintelligible (F.R.E 403,611(a)), Lack of Foundation/Speculation (F.R.E 602), lack of foundation (F.R.E 901), Compound Question (F.R.E 403, 611(a)), Relevance (F.R.E 401), Beyond Scope of 30b6 (F.R.E 611) Ambiguous, Vague, Unintelligible (F.R.E 403,611(a))	343:18-344:01	NR, NRT

Designations for Deposition of Gabriel Sterling (30(b)(6)) Oct. 12, 2022

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Exhibits Offered
11:10-11:19			
13:13-13:22	irrelevant; cumulative, F.R.E 403		
13:23-15:9			
15:10-15:25			
16:1-16:13			
16:14-16:22			
16:23-16:24			
17:15-17:19			
18:10-18:22	Hearsay; F.R.E 802		
19:22-20:5		20:07-20:24	NR, NRT
23:15-23:25			
24:4-24:8			
24:9-24:13	Question of counsel is inadmissible	24:14-25:02	NR, NRT
25:3-25:22		25:23-27:03	NR, NRT
27:4-27:9			
27:10-27:12			
27:13-27:22		27:23-28:06	NR, NRT
28:7-28:11		28:12-28:20	NR, NRT
29:5-29:23		29:24-30:23	NR, NRT
31:7-32:1			
32:2-32:23		32:24-33:11	NR, NRT
33:12-33:13		33:14-33:20	NR, NRT
33:23-34:7			
34:8-34:25		35:1-35:13	NR, NRT
35:14-36:16			
36:18-36:19			
37:4-37:12		36:20-37:03, 37:13-37:24	NR, NRT
39:20-40:4	lack of foundation/speculation F.R.E 602		
40:5-40:8	lack of foundation/speculation F.R.E 602		
40:24-41:13		41:14-42:01	NR, NRT
42:2-42:12	incomplete F.R.E 106	42:13-42:20	NR, NRT
42:21-42:23	incomplete F.R.E 106	42:24-43:05	NR, NRT
45:1-45:9			
45:10-45:12			
47:2-48:5	Hearsay F.R.E 801; Not relevant F.R.E 401; F.R.E 602/702 - lack of foundation/speculation		

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Exhibits Offered
47:22-48:5	Repeats portion of previous designation, is not necessary and should be omitted		
51:7-51:7	Designation is not testimony of the witness and is not evidence		
51:8-51:22	F.R.E 602/702 - lack of foundation/speculation and confusing, distracting, or a waste of time, F.R.E. 403		
52:21-53:6	Duplicative and cumulative of live testimony, confusing, distracting, or a waste of time, F.R.E. 403		
63:23-63:25	Designation contains statement from counsel and not testimony of the witness.		
64:3-64:5	Incomplete designation F.R.E 106	64:5-10	NR, NRT
64:11-64:24	Incomplete designation F.R.E 106 confusing, distracting, or a waste of time, F.R.E. 403.		
66:7-66:15	Duplicative of live testimony, cumulative, designation contains incomplete designation F.R.E 106		
69:7-69:25			
71:9-71:9	Statement by counsel and not testimony by the witness		
71:10-71:23			
72:23-73:7			
73:10-73:13	Statement by counsel and not testimony by witness		
73:17-74:7			
74:15-74:20			
74:21-75:20			
81:17-81:22	Argumentative, Irrelevant 401, statement by counsel and not testimony of witness		
81:23-81:23	Incomplete designation F.R.E 106, Irrelevant F.R.E 403		
81:25-82:25	Incomplete designation F.R.E 106, Irrelevant F.R.E 403		
84:20-85:2			
85:5-85:10	Incomplete designation F.R.E 106		
86:12-86:21	Incomplete designation F.R.E		

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Exhibits Offered
	106		
86:24-87:8	Incomplete designation F.R.E 106, duplicative and cumulative of live testimony		
88:9-88:19	Incomplete designation F.R.E 106, lack of foundation/speculation, F.R.E 602/702, confusing, distracting F.R.E 602		
88:24-89:4	Incomplete designation F.R.E 106, lack of foundation/speculation, F.R.E 602;		
90:16-90:20	Statement by counsel and not testimony by witness, confusing, distracting, or a waste of time, F.R.E. 403		
90:22-91:4			
91:5-91:9			
93:10-93:18			
94:19-94:24	Incomplete designation F.R.E 106, Irrelevant F.R.E 403, lack of foundation/speculation, F.R.E 602; confusing, distracting, or a waste of time, F.R.E. 403		
95:5-95:8			
99:10-99:21	Incomplete designation, F.R.E. 106, vague, compound, calls for speculation, assumes facts not in evidence; calls for improper opinion testimony F.R.E 701, 702; lacks personal knowledge F.R.E 602		
100:2-101:2	Incomplete designation, F.R.E. 106; lack of foundation/speculation, F.R.E 602; confusing, distracting, or a waste of time, F.R.E. 403		
101:22-102:18	Mostly attorney testimony for which there is no question to which the witness responds (F.R.E 403, 611(a)); Incomplete designation (F.R.E. 106);		
102:19-103:4	Incomplete designation, F.R.E. 106; confusing, distracting, or a		

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Exhibits Offered
	waste of time, F.R.E. 403		
103:18-104:2	Mostly attorney testimony for which there is no question to which the witness responds (F.R.E 403, 611(a)); Incomplete designation (F.R.E. 106); lack of foundation/speculation (F.R.E 602); confusing, distracting, or a waste of time (F.R.E. 403)		
108:9-108:25	Incomplete designation (F.R.E. 106)		
109:13-109:16	Lack of Foundation/Speculation (F.R.E 602), lack of foundation (F.R.E 901), Compound Question (F.R.E 403, 611(a))		
110:16-111:9			
111:19-111:22	Incomplete designation (F.R.E. 106)		
115:4-115:19	Incomplete designation (F.R.E. 106)		
115:20-115:24	Incomplete designation (F.R.E. 106)		
115:25-116:6			
116:16-116:24	Incomplete designation (F.R.E. 106)		
117:7-117:23			
118:11-119:13			
119:14-119:21			
120:6-120:23	Lack of foundation/speculation, F.R.E 602/702; confusing, distracting, or a waste of time, F.R.E. 403		
120:24-121:7	Lack of foundation/speculation, F.R.E 602/702; confusing, distracting, or a waste of time, F.R.E. 403		
124:16-125:4			
125:5-125:12			
127:18-127:23	Facts not in evidence		
128:2-128:5			
128:19-129:2			
129:4-129:4	Incomplete designation F.R.E 106		
130:7-130:18			

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Exhibits Offered
130:19-130:23			
130:24-131:13			
132:4-132:10			
133:7-133:10	Foundation/Speculation (F.R.E 602), lack of foundation (F.R.E 901), Compound Question (F.R.E 403, 611(a))		
133:12-133:12	Foundation/Speculation (F.R.E 602), lack of foundation (F.R.E 901), Compound Question (F.R.E 403, 611(a))		
134:9-134:18	Foundation/Speculation (F.R.E 602), lack of foundation (F.R.E 901), Compound Question (F.R.E 403, 611(a))		
135:2-135:5			
135:13-136:6			
136:14-136:21	Foundation/speculation, F.R.E. 602; Incomplete designation, F.R.E. 106		
137:9-137:11	Incomplete designation, F.R.E. 106, vague, compound, calls for speculation, assumes facts not in evidence; calls for improper opinion testimony F.R.E 701, 702; lacks personal knowledge F.R.E 602		
137:16-137:17			
139:4-139:17			
139:18-140:23	Incomplete designation, F.R.E. 106		
141:9-142:1	Incomplete designation, F.R.E. 106, Foundation/Speculation (F.R.E 602), lack of foundation (F.R.E 901), Compound Question (F.R.E 403, 611(a)),		
142:11-143:17	Incomplete designation, F.R.E. 106; calls for legal conclusion, F.R.E 701-03; lack of foundation/speculation, F.R.E 602; confusing, distracting, or a waste of time, F.R.E. 403		
144:24-145:11	This is entirely attorney testimony and there is no question to which the witness responds (F.R.E 403, 611(a))		

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Exhibits Offered
146:5-146:21			
147:10-147:15	Lack of foundation (F.R.E 901), Compound Question (F.R.E 403, 611(a)),		
147:16-148:10	Lack of foundation (F.R.E 901), Compound Question (F.R.E 403, 611(a)),		
150:4-150:20	Mostly attorney testimony and there is no question to which the witness responds (F.R.E 403, 611(a)), substantive portion of witness answer is Non-responsive (F.R.E 403, 611(a))		
156:21-159:17			
159:18-160:3			
160:4-160:8			
160:9-160:25			
192:24-193:2	Relevance (F.R.E 401/403), lack of foundation (F.R.E 901), Compound Question (F.R.E 403, 611(a))		
193:3-193:12			
193:4-193:12	Relevance (F.R.E 401/403), lack of foundation (F.R.E 901), Compound Question (F.R.E 403, 611(a))		
193:20-194:2			
194:8-194:10	Just an attorney question which is not evidence (F.R.E 403, 611(a)),		
194:13-194:19	Incomplete designation, F.R.E. 106, Foundation/Speculation (F.R.E 602), lack of foundation (F.R.E 901), Compound Question (F.R.E 403, 611(a)),		
197:1-197:11	Incomplete designation, F.R.E. 106, Foundation/Speculation (F.R.E 602), lack of foundation (F.R.E 901), Compound Question (F.R.E 403, 611(a)),		
197:23-198:3	Incomplete designation, F.R.E. 106, Foundation/Speculation (F.R.E 602), lack of foundation (F.R.E 901), Compound Question (F.R.E 403, 611(a)),		

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Exhibits Offered
198:25-199:18			
200:12-201:14			
203:18-203:23	Incomplete designation, F.R.E. 106, Foundation/Speculation (F.R.E 602), lack of foundation (F.R.E 901), Compound Question (F.R.E 403, 611(a)),		
204:2-204:14	Relevance (F.R.E 401/403), lack of foundation (F.R.E 901), Compound Question (F.R.E 403, 611(a))		
205:5-205:13			
205:14-206:7	Narrative Question (F.R.E 403, 611(a)), Foundation/Speculation (F.R.E 602), lack of foundation (F.R.E 901), Compound Question (F.R.E 403, 611(a))		
207:9-207:24			
207:25-208:5	Foundation/Speculation (F.R.E 602), lack of foundation (F.R.E 901), Compound Question (F.R.E 403, 611(a))		
208:7-208:7	Foundation/Speculation (F.R.E 602), lack of foundation (F.R.E 901)		
209:6-209:12			
211:19-212:21	Relevance (F.R.E 401), Prejudice outweighs probative value (F.R.E 401), Lack of Foundation/Speculation (F.R.E 602)		
212:22-214:3	Relevance (F.R.E 401), Prejudice outweighs probative value (F.R.E 401)/213:14-214:3 - Hearsay (F.R.E 403)/214:9-215:14 - Non-responsive, volunteered answer when no question asked (F.R.E 403, 611(a)), Lack of Foundation/Speculation (F.R.E 602)		
214:4-214:19	Relevance (F.R.E 401), Prejudice outweighs probative value (F.R.E 401)/213:14-214:3 - Hearsay (F.R.E 403)/214:9-215:14 - Non-		

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Exhibits Offered
	responsive, volunteered answer when no question asked (F.R.E 403, 611(a)), Lack of Foundation/Speculation (F.R.E 602)		
214:20-214:25	Relevance (F.R.E 401), Non-responsive(F.R.E 403, 611(a)), Lack of Foundation/Speculation (F.R.E 602)		
215:1-215:15	Relevance (F.R.E 401), Prejudice outweighs probative value (F.R.E 401)/213:14-214:3 - Hearsay (F.R.E 403)/214:9-215:14 - Non-responsive, volunteered answer when no question asked (F.R.E 403, 611(a)), Lack of Foundation/Speculation (F.R.E 602)		
215:17-215:20	Relevance (F.R.E 401), Prejudice outweighs probative value (F.R.E 401), Lack of Foundation/Speculation (F.R.E 602)		
215:22-216:2	Relevance (F.R.E 401), Prejudice outweighs probative value (F.R.E 401), Lack of Foundation/Speculation (F.R.E 602), Beyond Scope of 30b6 (F.R.E 611)		
216:19-216:25			
219:16-219:17	Exhibit is Hearsay (F.R.E 403) and no foundation was established as to the witness's knowledge and basis for testifying about the document as presented (F.R.E. 602)		
220:3-220:15	Relevance (F.R.E 401), Prejudice outweighs probative value (F.R.E 401)/213:14-214:3 - Hearsay (F.R.E 403)/214:9-215:14 - Non-responsive, volunteered answer when no question asked (F.R.E 403, 611(a)), Lack of Foundation/Speculation (F.R.E		

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Exhibits Offered
	602)		
220:16-221:1			
225:16-225:23	Relevance (F.R.E 401), Lack of Foundation/Speculation (F.R.E 602)		
225:24-226:10	Relevance (F.R.E 401), Non-responsive(F.R.E 403, 611(a)), Lack of Foundation/Speculation (F.R.E 602)		
227:20-227:23	Relevance (F.R.E 401), Prejudice outweighs probative value (F.R.E 401), Lack of Foundation/Speculation (F.R.E 602), Beyond Scope of 30b6 (F.R.E 611)		
228:1-228:5	Relevance (F.R.E 401), Prejudice outweighs probative value (F.R.E 401), Lack of Foundation/Speculation (F.R.E 602), Beyond Scope of 30b6 (F.R.E 611)		
230:1-230:8	Relevance (F.R.E 401)		
230:9-230:12	Relevance (F.R.E 401), Prejudice outweighs probative value (F.R.E 401), Lack of Foundation/Speculation (F.R.E 602), Beyond Scope of 30b6 (F.R.E 611)		
233:15-233:16			
234:5-234:16			
235:15-236:2			
243:9-245:1			
248:5-248:10			
248:16-248:17			
248:22-249:9			
249:10-250:6	Lack of Foundation/Speculation (F.R.E 602), lack of foundation (F.R.E 901), Compound Question (F.R.E 403, 611(a)), Relevance (F.R.E 401), Best Evidence Rule (F.R.E 1000-1004), Beyond Scope of 30b6 (F.R.E 611)		
252:21-255:4			

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Exhibits Offered
259:18-259:24	Confusing, Misleading, and unintelligible (F.R.E 403, 611(a)), Lack of Foundation/Speculation (F.R.E 602), lack of foundation (F.R.E 901), Compound Question (F.R.E 403, 611(a)), Relevance (F.R.E 401), Beyond Scope of 30b6 (F.R.E 611). Ambiguous, vague, unintelligible (F.R.E 403, 611(a))		
260:9-260:20			
260:23-261:9			
261:10-261:13	Relevance (F.R.E 401), Prejudice outweighs probative value (F.R.E 401), Lack of Foundation/Speculation (F.R.E 602), Beyond Scope of 30b6 (F.R.E 611)		
266:1-266:7			
266:6-266:13	Incomplete (F.R.E 106)		
266:15-266:16			
266:17-268:1			
268:4-268:9			
268:13-268:21			
269:15-270:1			
270:2-270:5			
270:6-271:2			
273:17-273:24			
274:5-274:19	Relevance (F.R.E 401), Prejudice outweighs probative value (F.R.E 401), Lack of Foundation/Speculation (F.R.E 602), Beyond Scope of 30b6 (F.R.E 611)		
274:20-275:4			
275:5-277:18	275:5-276:3 - Non-responsive (F.R.E 403, 611(a)), Narrative Answer (F.R.E 611), Lack of Foundation/Speculation (F.R.E 602), lack of foundation (F.R.E 901), Compound Question (F.R.E 403, 611(a)), Relevance (F.R.E 401),		
277:19-277:22			

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Exhibits Offered
278:22-279:9			
279:12-279:13			
280:14-280:15			
280:23-281:7	Lack of Foundation/Speculation (F.R.E 602)		
281:8-281:19	Relevance (F.R.E 401), Lack of Foundation/Speculation (F.R.E 602), Beyond Scope of 30b6 (F.R.E 611), Lack of Foundation (F.R.E 901)		
284:1-284:6			
284:7-284:22			
284:23-285:12	Lack of Foundation/Speculation (F.R.E 602)		
292:3-292:11			
295:24-296:5	Asked and Answered (F.R.E 403, 611), Argumentative Question (F.R.E 611(a)), Lack of Foundation/Speculation (F.R.E 602), Beyond Scope of 30b6 (F.R.E 611)		
297:18-299:6			
299:7-299:18			
300:5-301:14	Lack of Foundation/Speculation (F.R.E 602)		
301:21-302:2			
303:25-304:19	Incomplete (F.R.E 106)		
311:12-311:21			
324:13-325:2			
331:14-332:16			
333:18-334:10	Incomplete (F.R.E 106)		
335:6-335:21	Hearsay (F.R.E 403), Relevance (F.R.E 401), Lack of Foundation/Speculation (F.R.E 602), Beyond Scope of 30b6 (F.R.E 611)		
336:12-337:2			
337:3-338:2	337:3-4 - Counsel testimony is not part in the form of a question/337:4-338:2 questions and answers about Hearsay (F.R.E 403) article is Confusing, Misleading, Lack of		

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter-Designations	Exhibits Offered
	Foundation/Speculation (F.R.E 602), Relevance (F.R.E 401), Lack of Foundation/Speculation (F.R.E 602), Beyond Scope of 30b6 (F.R.E 611), Lack of Foundation (F.R.E 901)		
389:12-389:17	Confusing, Misleading, and unintelligible question (F.R.E 403/611(a)), Lack of Foundation/Speculation (F.R.E 602), Compound Question (F.R.E 403, 611(a)), Misstates Evidence or Misquotes Witness (F.R.E 403, 611(a)), Counsel cannot testify (F.R.E 403, 611(a))		
389:24-390:1	Non-responsive (F.R.E 403, 611(a)), Narrative Answer (F.R.E 611), Relevance (F.R.E 401), Lack of Foundation/Speculation (F.R.E 602), Beyond Scope of 30b6 (F.R.E 611)		

Designations for Deposition of Juan Gilbert Oct. 29, 2021

Plaintiffs Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Exhibits Offered
9:19-9:20			
13:3-13:21	Irrelevant F.R.E 401; Its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.		
14:1-14:6	Irrelevant F.R.E 401; Its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.	14:7-13	NR, NRT
14:22-15:2	Irrelevant F.R.E 401; Its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.	14:7-13	NR, NRT
25:19-25:24	Irrelevant F.R.E 401; Its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.	25:14-18	NR, NRT
36:11-36:18	Incomplete (F.R.E 106)	36:19-24	NR, NRT
57:19-58:2	Incomplete (F.R.E 106)	58:13-59:15	NR, NRT
68:16-68:22	Irrelevant F.R.E 401; Its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.	68:4-13	NR, NRT
73:2-73:13			
75:8-75:15	Irrelevant F.R.E 401; Its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E.		

	602.		
89:9-89:16	F.R.E 802: Hearsay		
97:24-98:14	Irrelevant F.R.E 401; Its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.		
98:16-99:1	Irrelevant F.R.E 401; Its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.		
131:24-132:12	Irrelevant F.R.E 401; Its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.		
134:16-135:16		135:17-25	NR, NRT
144:7-17			
186:18-187:2			
187:22-188:1			
188:9-188:20	Incomplete statement, F.R.E 106	188:2-8	NR, NRT
197:21-198:12		198:15-25	NR, NRT
206:25-209:5			
214:6-214:11	Irrelevant F.R.E 401; Its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403		
214:13-214:23	Irrelevant F.R.E 401; Its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403		
214:25-215:14	Irrelevant F.R.E 401; Its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403		
216:20-223:8			
223:19-224:22			
224:25-225:15			

225:22-227:3			
228:2-228:16			
228:22-229:12			
229:18-230:24			
231:4-231:21			
233:3-233:11			
233:18-234:7			
234:14-235:5			
235:13-235:20			
236:2-236:11			
236:21-237:5			
237:12-237:21			
237:25-238:14			
238:22-239:6		239:25-240:20	NR, NRT
242:16-242:24			
243:13-244:12			
245:6-245:22			
251:22-252:2	Irrelevant F.R.E 401; Its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403		
252:5-252:9	Irrelevant F.R.E 401; Its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403	252:19-253:4	NR, NRT
253:12-254:3			

Designations for Deposition of Michael Shamos, July 19, 2019

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
56:13 - 57:18			
57:21 - 57:21			
70:19 - 71:9	Object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation.		
97:14 - 98:13	Irrelevant F.R.E 401; Its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.	98:14-22	NR, NRT
106:20 – 107:18	Irrelevant F.R.E 401; Its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation		
107:20 – 107:25	Incomplete statement, F.R.E 106; Irrelevant F.R.E 401; Its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of		
165:5 – 166:1	Irrelevant F.R.E 401; Its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation.		

Designations for Deposition of Janice Johnston, August 23, 2022

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
9:15 - 9:20			
14:11 – 15:3	Irrelevant F.R.E 401; Its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.		
14:21 – 15:6	Irrelevant F.R.E 401; Its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.		
15:5-15:6	Irrelevant F.R.E 401; Its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.		

Designations for Deposition of Dean Felicetti (30b6), Sept. 2, 2022

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
10:4 - 10:7			
14:15-14:18			
22:22 - 23:7			
23:17- 24:10			
24:22 - 25:11			
25:15 - 26:1			
26:13 - 26:22			
27:10 - 27:16			
27:20 - 28:14			
28:17 - 29:7			
29:15 - 29:21			
30:3 - 30:16			
30:17 - 31:4			
32:10 - 33:11			
33:20 - 34:5			
34:9 - 35:1			
36:4 - 36:12			
36:19 - 37:6			
38:2 - 38:5			
38:14 - 39:4	F.R.E 403 & 611(a): Vague		
40:10 - 41:19			
43:20 - 46:5	F.R.E 701: Improper lay opinion testimony		
46:19 - 47:5	F.R.E 701: Improper lay opinion testimony; Lack of foundation		
48:1 - 48:5			
50:13 - 50:18			
51:1 - 51:6			
62:12 - 62:21			
63:14 - 63:22			
64:1 - 64:3			
72:1 - 72:21			

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
75:3 - 75:10	F.R.E 701: Improper lay opinion testimony		
78:1 - 78:12			
80:4 - 80:8	F.R.E 402: Irrelevant		
81:20 - 82:11			
86:5 - 86:16			
103:6 - 103:22			
107:3 - 108:2	F.R.E 802: Hearsay		
111:1 - 111:9			
112:5 - 112:9			
112:19 - 113:6			
113:9 - 113:14			
114:3 - 115:2	F.R.E 802: Hearsay		
116:19 - 117:11	F.R.E 802: Hearsay		
118:17 - 118:22			
119:4 - 119:15			
125:11 - 126:2			
142:15 - 143:9	F.R.E 401 - Not relevant; F.R.E 602 - Lack of foundation/speculation		
144:9 - 145:5	F.R.E 401 - Not relevant; F.R.E 602 - Lack of foundation/speculation		
145:12 - 145:18	F.R.E 401 - Not relevant; F.R.E 602 - Lack of foundation/speculation		
146:5 - 147:5	F.R.E 401 - Not relevant; F.R.E 602 - Lack of foundation/speculation		
154:17 - 155:9	F.R.E 401 - Not relevant; F.R.E 602 - Lack of foundation/speculation		

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
157:2 - 157:9	F.R.E 401 - Not relevant; F.R.E 602 - Lack of foundation/speculation		
157:10 - 157:19	F.R.E 401 - Not relevant; F.R.E 602 - Lack of foundation/speculation		
166:3 - 166:10	F.R.E 401 - Not relevant; F.R.E 602 - Lack of foundation/speculation		
167:8 - 169:15	F.R.E 401 - Not relevant; F.R.E 602 - Lack of foundation/speculation		
173:1 - 174:19	F.R.E 401 - Not relevant		
176:12 - 177:12	F.R.E 401 - Not relevant		
189:3 - 189:11	F.R.E 401 - Not relevant		
191:2 - 191:11	F.R.E 401 - Not relevant; F.R.E 602 - Lack of foundation / Speculation		
200:16 - 202:4	F.R.E 401 - Not relevant		
214:21 - 215:12	F.R.E 401 - Not relevant		
215:22 - 216:11	F.R.E 401 - Not relevant		
219:5 - 219:9	F.R.E 401 - Not relevant; F.R.E 602 - Lack of foundation / Speculation		
220:11 - 222:1	F.R.E 401 - Not relevant		

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
226:11 - 227:2	F.R.E 401 - Not relevant; F.R.E 602 - Lack of foundation / Speculation		
229:14 - 230:15	F.R.E 401 - Not relevant; F.R.E 602 - Lack of foundation / Speculation		
234:14 - 235:6	F.R.E 401 - Not relevant; F.R.E 602 - Lack of foundation / Speculation		
241:14 - 245:6	F.R.E 401 - Not relevant		
255:7 - 257:16	F.R.E 401 - Not relevant		
290:2 - 290:18	F.R.E 401 - Not relevant; F.R.E 602 - Lack of foundation / Speculation		
291:13 - 291:18	F.R.E 401 - Not relevant		

Designations for Deposition of Eric Chaney, Aug. 15, 2022

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counterdesignations	Plaintiffs' Counter Objections
8:13 - 8:15			
29:4 - 29:15	Irrelevant F.R.E 401		
30:7 - 30:16	Irrelevant F.R.E 401		
35:16 - 36:12	Fifth Amendment, Hearsay, Document speaks for itself		
36:25 - 37:10	Fifth Amendment, Hearsay, Document speaks for itself		
38:14 - 38:18	Fifth Amendment, Hearsay, Document speaks for itself		
39:9 - 40:4	Fifth Amendment, Hearsay, Document speaks for itself		
60:8 - 61:17	Fifth Amendment; Irrelevant 401; Hearsay, document speaks for itself; incomplete document F.R.E 106; lack of foundation, F.R.E 602		
99:15 - 99:19	Fifth Amendment		
99:21 - 100:19	Fifth Amendment		
101:5 - 101:7	Fifth Amendment		
121:7-13	Fifth Amendment; Its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
123:15- 124:13	Fifth Amendment		

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counterdesignations	Plaintiffs' Counter Objections
127:10 - 128:7	Fifth Amendment		
129:8 - 129:17	Fifth Amendment; and the cited portion reflects an incomplete statement		
129:20 - 129:20	Fifth Amendment		
133:1 - 133:10	Fifth Amendment		
133:12 - 133:16	Fifth Amendment; and the cited portion reflects an incomplete statement.		
165:3 - 165:8	Irrelevant, F.R.E 401		
165:11 - 165:13	Hearsay, F.R.E 802, Irrelevant		
166:15 - 167:11	Hearsay, F.R.E 802, Irrelevant, F.R.E 401		
167:13 - 167:18	Irrelevant, F.R.E 401		
180:3-7	Fifth Amendment		

Designations for Deposition of Ben Cotton, Aug. 25, 2022

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
13:8 - 13:13			
28:14 - 28:21	Irrelevant, F.R.E 401		
69:15 - 70:12	Irrelevant, F.R.E 401, calls for speculation, F.R.E 602, Confusing questions, F.R.E 403, 611		
82:14 - 83:14	Irrelevant, F.R.E 401		
86:17 - 87:1	Irrelevant, F.R.E 401		
87:6 - 87:10	Irrelevant, F.R.E 401		
87:14 - 87:15	Irrelevant, F.R.E 401		
88:1 - 88:2	Irrelevant, F.R.E 401		
88:7 - 89:8	Irrelevant, F.R.E 401		
105:19 - 105:21	Irrelevant, F.R.E 401		
106:3 - 106:6	Irrelevant, F.R.E 401		
122:5 - 122:10	Irrelevant, F.R.E 401; incomplete testimony, FRCP 32(a)(6)	105:5-106:6	ARG, CM
122:15 - 122:18	Irrelevant, F.R.E 401		
124:2 - 124:6	Irrelevant, F.R.E 401; incomplete testimony, FRCP 32(a)(6)	124:22-8	ARG, CM
127:20 - 128:10	Irrelevant, F.R.E 401		
130:9 - 130:11	Irrelevant, F.R.E 401; lack of foundation, F.R.E 602	105:5-106:6	ARG, CM
135:6 - 136:10	Irrelevant, F.R.E 401		

Designations for Deposition of Misty Hampton, Nov. 11, 2022

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
11:17 - 11:19	Relevance, F.R.E 401		
16:8 - 16:10			
18:7 - 19:17	Seeks opinion on ultimate issue F.R.E 704		
22:17 - 22:20	Relevance, F.R.E 401		
23:3 - 23:14	The citation is an incomplete portion of the question, F.R.E 106; F.R.E 602 – lack of foundation, speculation; hearsay F.R.E 801.		
24:4 - 24:8	The citation is an incomplete portion of the question, F.R.E 106; F.R.E 602 – lack of foundation, speculation; hearsay F.R.E 801.		
49:22 - 50:11	Relevance, F.R.E 401		
63:9 - 64:3	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	62:5 - 64:5; 62:5-65:6	NR, NRT
78:3 - 78:7	Relevance, F.R.E 401		
87:9-14	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.		
99:19 - 101:2	Relevance, F.R.E 401		
101:18 - 102:15	Relevance, F.R.E 401, the cited portion reflects and incomplete exchange in the deposition, F.R.E 106	101:19-102:12; 101:13-102:22	CM, F ; CM, ARG, I
113:13 - 113:19	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	113:13 - 114:10	NR, ARG, CM
113:21 - 113:21	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	113:13 - 114:10	NR, ARG, CM

114:11 - 115:6	Hearsay, F.R.E. 802. Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106. Lack of foundation/speculation, F.R.E. 602.	114:11 - 115:19	CM, F, H
117:1 - 117:15	Hearsay, F.R.E. 802. Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106. Lack of foundation/speculation, F.R.E. 602.	117:1 - 118:8	CM, NR
118:9 - 118:13	Hearsay, F.R.E. 802. Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106. Lack of foundation/speculation, F.R.E. 602.	117:1 - 118:19	CM, NR, ARG
118:21 - 119:14	Fifth amendment. Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106. Lack of foundation/speculation, F.R.E. 602.	118:19 - 120:2	NR, ARG, CM, F
124:5 - 124:11	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition F.R.E. 106.	124:5 - 124:14	NR, ARG
124:13 - 124:14	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	124:5 - 124:14	NR, ARG
126:14 - 126:16	Relevance, F.R.E. 401		
127:2 - 127:16	Relevance, F.R.E. 401		
141:19 - 142:2	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	141:19 - 143:21	NR, ARG
142:15 - 142:16	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition F.R.E. 106	141:19 - 143:21	
142:18 - 143:1	Relevance, F.R.E. 401. The cited portion reflects an	141:19 - 143:21	NR, ARG

	incomplete exchange in the deposition, F.R.E. 106.		
144:2 - 144:8	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	141:19 - 143:21; 141:19 - 144:19	NR, ARG
144:12 - 144:16	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	141:19 - 144:19	NR, ARG
144:19 - 144:19	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	144:12 - 146:1	NR, ARG
173:17-19	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.		
188:6 -190:4	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	189:13 - 190:22	NR, ARG
211:16- 212:1	Relevance, F.R.E. 401. There is no context for this limited exchange excerpt, F.R.E 106.		
214:15- 215:1	Relevance, F.R.E. 401. There is no context for this limited exchange excerpt, F.R.E 106.		
216:19 - 217:10	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	216:19 - 217:13	NR, ARG
217:13 - 217:13	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	216:19 - 217:13	
217:18 - 218:11	Relevance, F.R.E. 401. There is no context for this limited exchange excerpt, F.R.E 106.		
222:18 - 222:22	Relevance, F.R.E. 401. There is no context for this limited exchange excerpt, F.R.E 106.		
223:18 - 223:20	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106.	223:18 - 224:1	NR, ARG
223:22 - 224:1	Relevance, F.R.E. 401. The cited portion reflects an	223:18 - 224:1	NR, ARG

	incomplete exchange in the deposition, F.R.E. 106. Fifth amendment.		
227:2 - 228:14	Relevance, F.R.E. 401. There is no context for this limited exchange excerpt, F.R.E 106. Fifth amendment.		
229:6 - 229:16	Relevance, F.R.E. 401. There is no context for this limited exchange excerpt, F.R.E 106.		
237:19 - 237:22	Relevance, F.R.E. 401. There is no context for this limited exchange excerpt, F.R.E 106.		
244:16 - 245:1	Relevance, F.R.E. 401. The cited portion reflects an incomplete exchange in the deposition, F.R.E. 106	244:16 - 245:4	NR, ARG
245:4 - 245:10	Relevance, F.R.E 401, The cited portion reflects an incomplete exchange in the deposition, F.R.E 106.	244:16 - 245:4	

Designations for Deposition of Cathleen Latham, Aug. 8, 2022

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
12:11 - 12:13	Relevance, F.R.E. 401.		
24:16 - 24:22	Lack of foundation/speculation, F.R.E. 602; improper lay witness opinion, F.R.E. 701; Fifth amendment		
25:9 - 25:11	Lack of foundation/speculation, F.R.E. 602; improper lay witness opinion, F.R.E. 701; Fifth amendment		
29:9 - 29:22	Lack of foundation/speculation, F.R.E. 602; improper lay witness opinion, F.R.E. 701; Fifth amendment		
32:10 - 34:12	Lack of foundation/speculation, F.R.E. 602; improper lay witness opinion, F.R.E. 701; Fifth amendment		
53:15 - 54:2	Lack of foundation/speculation, F.R.E. 602; improper lay witness opinion, F.R.E. 701; Fifth amendment		
67:3-67:14	Relevance, F.R.E. 401		
69:4-69:11	Lack of foundation/speculation, F.R.E. 602; improper lay witness opinion, F.R.E. 701, 5th Amendment		
69:22-70:3	Lack of foundation/speculation, F.R.E. 602; improper lay witness opinion, F.R.E. 701, 5th Amendment		
128:24 - 129:10	Relevance, F.R.E. 401		
131:21 - 134:7	Relevance, F.R.E. 401		
134:8 - 134:11	Relevance, F.R.E. 401		
169:5- 171:20		171:21 - 171:25	ARG
172:1-172:8			
191:21-24	Relevance, F.R.E. 401		

192:6-193:7	Relevance, F.R.E. 401		
203:2 - 203:20	Lack of foundation/speculation, F.R.E. 602		
203:25 - 204:15	Relevance, F.R.E. 401		
205:5 - 205:17	Relevance, F.R.E. 401		
205:18 - 206:9	Relevance, F.R.E. 401		
211:19 - 212:9		208:6 - 211:12	NR; SCOPE

Designations for Deposition of Jeffrey Lenberg, Nov. 21, 2022

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
10:15 - 10:17			
71:8 - 72:7	Relevance, F.R.E. 401	69:21 - 71:7	
74:17 - 75:4	Relevance, F.R.E. 401		
88:15 - 89:11	Relevance, F.R.E. 401		
90:15 - 91:15			
92:20 - 93:12			
94:1 - 95:13			
109:13 - 110:1	Relevance, F.R.E. 401		
110:4 - 113:18	Relevance, F.R.E. 401		
116:16 - 117:2	Relevance, F.R.E. 401		
121:3 - 121:6	Relevance, F.R.E. 401		
134:21 - 136:2			
139:19 - 140:16	Relevance, F.R.E. 401		
152:6 - 152:17	Relevance, F.R.E. 401		
160:13 - 161:19	Relevance, F.R.E. 401		
175:18 - 176:19			
179:16 - 180:2		180:5 - 180:6	ARG; NR
184:17 - 185:15	Relevance, F.R.E. 401		
187:8 - 187:15	Lack of foundation/speculation, F.R.E. 602; relevance, F.R.E. 401		
188:2 - 188:7	Lack of foundation/speculation, F.R.E. 602; relevance, F.R.E. 401		
190:18 - 190:21	Lack of foundation/speculation/personal knowledge, F.R.E. 602 and hearsay, F.R.E. 801. Witness testimony is irrelevant, F.R.E. 401.	194:3-10	F;I
191:14 - 191:19	Lack of foundation/speculation/personal knowledge, F.R.E. 602 and hearsay,	194:3-10	F;I

	F.R.E. 801. Witness' testimony is irrelevant, F.R.E. 401.		
225:21 - 226:1	Lack of foundation/speculation/personal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702, and the basis for such testimony does not meet the requirements of F.R.E. 703.		
240:18 - 240:19	Lack of foundation/speculation/personal knowledge, F.R.E. 602, and witness' testimony is based on hearsay, F.R.E. 801 and is irrelevant, F.R.E. 401	240:2-6, 240:11-15	I;NR
240:21 - 241:2	Lack of foundation/speculation/personal knowledge, F.R.E. 602; and witness' testimony is based on hearsay, F.R.E. 801 and is irrelevant, F.R.E. 401.		
252:11 - 253:5	Lack of foundation/speculation/personal knowledge, F.R.E. 602; and witness' testimony is based on hearsay, F.R.E. 801 and is irrelevant, F.R.E. 401.		
259:16 - 260:4	Lack of foundation/speculation/personal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. Question has been asked and answered and is argumentative, F.R.E. 403 and is leading F.R.E. 611.		

	Lack of foundation/speculation/personal knowledge, F.R.E 602, improper lay witness opinion, F.R.E 701. Witness' testimony is vague, based on hearsay, F.R.E 801, irrelevant, F.R.E 401, and, even if relevant, is subject to exclusion, F.R.E 403		
260:12 - 262:4	Lack of foundation/speculation/personal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. Witness' testimony is irrelevant, F.R.E. 401, and, even if relevant, is subject to exclusion, F.R.E. 403.		
294:14 - 295:13	Witness' testimony is irrelevant, F.R.E. 401. Lack of foundation/speculation/personal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701. Hearsay, F.R.E. 801.		

Designations for Deposition of Doug Logan, Nov. 18, 2022

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
8:3 - 8:4			
25:23 – 26:10	Lack of foundation/speculation/personal knowledge/personal knowledge/F.R.E. 602; improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. Hearsay, F.R.E. 801. Witness' testimony is irrelevant, F.R.E. 401.		
44:19 - 45:14	Lack of foundation/speculation /personal knowledge, F.R.E. 602; improper lay witness opinion, F.R.E. 701. Witness' testimony is vague, based on hearsay, F.R.E. 801, irrelevant, F.R.E. 401, and, even if relevant, is subject to exclusion, F.R.E. 403.		
47:11 - 48:2	Witness' testimony is vague, based on hearsay, F.R.E. 801, irrelevant, F.R.E. 401, and, even if relevant, is subject to exclusion 403.		
50:8 - 50:18	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 401 and 403.		
51:11 - 51:17	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 401 and 403 and is improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony		
	meet the		

	requirements of F.R.E. 703. Lack of foundation, F.R.E 901, lack of personal knowledge, F.R.E 602, and improper legal conclusion, F.R.E 701.		
51:21 - 52:17	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 401 and 403 and is improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony meet the requirements of F.R.E. 703. Lack of foundation, F.R.E 901, lack of personal knowledge, F.R.E 602, and improper legal conclusion, F.R.E 701.		
75:10-13	Lack of foundation, F.R.E 901. Testimony is not relevant, F.R.E. 401 and 403.		
112:21 - 113:14	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801. Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401 and 403.		
115:12 - 116:2	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801. Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401 and 403.		
122:21 - 123:20	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801. Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401 and 403.		

124:24 - 126:5	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801 and is improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. Testimony is not relevant, F.R.E. 401 and 403. Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801 and is improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703.		
132:21 - 133:8	Testimony is not relevant, F.R.E. 401 and 403. Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801 and is improper lay witness opinion, F.R.E. 701 and witness has not been qualified as an expert, F.R.E. 702 and the basis for such testimony does not meet the requirements of F.R.E. 703. Testimony is not relevant, F.R.E. 401 and 403.		
155:25 - 157:4	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801. Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401 and 403.		
168:8 - 169:14	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801. Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401 and 403. The cited portion also		

	includes improper and inadmissible statements or testimony by the questioning attorney.		
207:9 - 207:17	Witness' testimony is based on speculation, F.R.E. 701 and hearsay, F.R.E. 801. Witness lacks personal knowledge of facts, F.R.E. 602. Testimony is not relevant, F.R.E. 401 and 403.	209:21-210:11; 210:20-22; 212:22-213:3; 213:20-24; 221:19-222:3; 223:8-17	SCOPE; NR; I; S

Designations for Deposition of Wendell Stone, Sept. 1, 2022

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
10:1 - 10:3			
11:25 - 12:3			
26:12 - 26:19	Relevance, F.R.E. 401		
48:20 - 49:1	Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.	48:24-49:1	
49:3 - 49:9	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
50:7 - 50:16	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
50:21 - 50:25	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401.		
59:4 - 59:20	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401.		
67:2 - 67:6	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401.	67:7-67:12	CM; I
69:5 - 69:10	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401.		

71:9 - 71:19	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401. Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
72:5 - 73:10	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
77:1 - 77:5	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
77:7 - 77:13	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
81:18 - 82:3	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
82:5 - 82:8	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
86:5 - 86:19	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401.		
87:13 - 87:25	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401.		

95:23 - 96:3	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401.		
97:10 - 97:15	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401.		
99:20 - 100:4	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401.		
101:8-17	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401.		
106:14-21	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401.		
133:7 - 133:12	Lack of foundation/speculation, F.R.E. 602; Relevance F.R.E 401; and the cited portion reflects an incomplete statement.		
133:17 - 134:2	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401.		
135:22 - 136:3	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.	136:4-136:8	
146:7-147:12	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
189:13 - 189:18	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		

189:21 - 190:3	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401; and the cited portion reflects an incomplete statement.		
201:1 - 201:7	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401.		
203:2 - 203:19	Lack of foundation/speculation, F.R.E. 602; Relevance, F.R.E. 401.		
218:18 - 218:25	Relevance, F.R.E. 401.		

Designations for Deposition of Alex Cruce, Nov. 22, 2022

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
8:18 - 8:20			
16:6 - 16:10	Irrelevant, F.R.E 401		
16:11 - 16:17	Irrelevant, F.R.E 401		
44:20 - 45:8	Irrelevant, F.R.E 40, Compound question, F.R.E 403, 611		
46:4 - 46:16	Irrelevant, F.R.E 401		
51:2 - 53:1	Irrelevant, F.R.E 401		
51:5 - 51:10	Irrelevant, F.R.E 401		
51:14 - 51:22	Irrelevant, F.R.E 401		
53:2 - 54:8	Irrelevant, F.R.E 401		
53:22 - 54:8	Irrelevant, F.R.E 401		
54:9 - 55:13	Irrelevant, F.R.E 401		
64:20 - 65:6	Irrelevant, F.R.E 401		
65:20 - 66:17	Irrelevant, F.R.E 401		
68:21 - 69:3	F.R.E 602: Speculation, F.R.E 801: Hearsay		
69:8 - 69:21	F.R.E 602: Speculation, F.R.E 801: Hearsay		
71:13 - 71:21	F.R.E 802: Hearsay		
72:4 - 72:10			
72:4 - 72:14	Speculation, F.R.E 801; Irrelevant, F.R.E 401		
75:20 - 76:9			
75:20 - 76:19			
79:14 - 80:5			
81:14 - 82:2			
82:13 - 82:20	Speculation, F.R.E 801; Irrelevant, F.R.E 401		
84:3 - 84:14	F.R.E 602: Speculation; F.R.E 801: Hearsay		

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
86:1 - 86:13			
88:9 - 88:12	F.R.E 602: Speculation; F.R.E 802: Hearsay; lack of foundation		
88:18 - 89:10	F.R.E 602: Speculation; F.R.E 802: Hearsay; lack of foundation		
95:8 - 95:17	F.R.E 602: Speculation; F.R.E 802: Hearsay; lack of foundation		
96:19 - 97:1	F.R.E 602: Speculation; F.R.E 802: Hearsay; lack of foundation		
97:8 - 97:16	F.R.E 602: Speculation; F.R.E 802: Hearsay; lack of foundation		
120:18 - 121:11			
135:8 - 136:6	F.R.E 602: Speculation; F.R.E 802: Hearsay; F.R.E 402: Irrelevant; lack of foundation		
135:21 - 136:6	F.R.E 602: Speculation; F.R.E 802: Hearsay; F.R.E 402: Irrelevant; lack of foundation		
139:7 - 139:9	F.R.E 602: Speculation; F.R.E 802: Hearsay; F.R.E 402: Irrelevant; lack of foundation		
140:2 - 140:5	F.R.E 602: Speculation; F.R.E 802: Hearsay; F.R.E 402: Irrelevant; lack of foundation		
141:1 - 141:9	F.R.E 602: Speculation; F.R.E 802: Hearsay; F.R.E 402: Irrelevant; lack of foundation		

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
141:19 - 141:22	F.R.E 602: Speculation; F.R.E 802: Hearsay; F.R.E 402: Irrelevant; lack of foundation		
144:15 - 145:17	F.R.E 602: Speculation		
150:6 - 150:20	F.R.E 802: Hearsay		
180:19 - 181:4	F.R.E 802: Hearsay		
181:8 - 181:14			
192:22 - 193:6			

Designations for Deposition of James Barnes, July 20, 2022

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
6:1 - 6:10			
12:11 - 12:13	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.		
16:1 - 16:6			
18:23 - 19:1	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.		
19:4 - 19:5	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.		
21:19 - 23:3	The cited portion reflects an incomplete answer, F.R.E. 106.	20:21-21:18; 26:2-26:10	ARG; NR
38:7 - 38:10			
38:21 - 38:24	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.	38:11 - 38:20; 39:11 - 39:13	NR
39:14 - 39:25			
41:6 - 42:10	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401. Lack of foundation/speculation. F.R.E. 602.		

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
42:16 - 42:22	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401. Lack of foundation/speculation. F.R.E. 602.		
52:16 - 52:22	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401;further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.		
53:2 - 53:25	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401;further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.		
54:7 - 54:13	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401;further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.		

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
59:16 - 60:2	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602, Designated testimony contains hearsay, F.R.E. 802		
65:6 - 65:15	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602, Designated testimony contains hearsay, F.R.E. 802		
69:11 - 69:18	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602	69:7 - 69:10	I
70:9 - 70:11	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401.		

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
71:4 - 72:7	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.		
71:25 - 72:7	"No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602."		
73:2 - 73:21	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.	72:23 - 73:1	

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
73:25 - 74:5	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.	72:23 - 73:1	
73:25 - 75:9	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.	72:23 - 73:1	
75:10 - 75:20	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.	76:4 - 76:21	

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
75:25 - 76:13	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602.	76:4 - 76:21	
76:16 - 76:21	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
77:3 - 77:15	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
77:24 - 78:2	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
78:7 - 78:15	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	77:17 - 78:2	
82:4 - 83:1		84:20 - 85:7 88:17-19; 88:21-22	SCOPE
95:4 - 95:9	Legal conclusion		
95:15 - 95:23			
96:5 - 96:24	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation. F.R.E. 602; improper/unsupported opinion testimony, F.R.E. 701.		
97:18 - 98:1	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	98:2 - 98:18	

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
99:5 - 99:16	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
99:19 - 99:24	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
106:9 - 106:16	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; lack of foundation, F.R.E. 602; designation is lawyer argument and not testimony of the witness.		
106:17 - 107:1	Portions of designation is lawyer argument and debate; lack of foundation, F.R.E.602; designated testimony contains hearsay, F.R.E. 802		
107:9 - 109:4	Portions of designation is lawyer argument and debate; lack of foundation, F.R.E.602; designated testimony contains hearsay, F.R.E. 802		

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
109:16 - 110:3	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; lack of foundation, F.R.E. 602; designated testimony contains hearsay, F.R.E. 802; portions of the designation is lawyer argument/testimony and not testimony of the witness.		
110:16 - 110:22	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; lack of foundation, F.R.E. 602; designated testimony contains hearsay, F.R.E. 802; portions of the designation is lawyer argument/testimony and not testimony of the witness.		
110:23 - 111:3	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; lack of foundation, F.R.E. 602; designated testimony contains		

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
	hearsay, F.R.E. 802; portions of the designation is lawyer argument/testimony and not testimony of the witness.		
111:16 - 111:21	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; lack of foundation, F.R.E. 602; designated testimony contains hearsay, F.R.E. 802; portions of the designation is lawyer argument/testimony and not testimony of the witness.		
112:23 - 113:5	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; lack of foundation, F.R.E. 602	153:16 - 154:7; 155:6 - 155:21	COM; LO; F
114:1 - 114:16	The cited portion reflects an incomplete answer, F.R.E. 106. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; lack of foundation, F.R.E. 602		

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
122:10 - 122:21	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; lack of foundation, F.R.E. 602; Argumentative attorney testimony.	122:3 - 122:16	F; COM
124:8 - 124:12	The cited portion contains only a question and no witness testimony. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403; compound question and argumentative		
124:14 - 124:18	The cited portion contains only an answer and no question. No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	123:7-25; 124:2-7; 124:19 -126:3	COM; 403; S
126:9 - 126:25	Designated testimony contains hearsay, F.R.E. 802; designation contains compound question.	127:1 - 128:6 129:13 - 24	F; S

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
137:18 - 138:11	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403. Lack of foundation/speculation, F.R.E. 602; designation contains hearsay, 802.		
151:20 - 152:7			
157:20 - 159:11	Portions of the designation are not relevant and call for speculation; F.R.E. 401, 602; designation contains incomplete answer.	153:16 - 154:7; 155:6 - 155:21	SCOPE; LO; F
159:25 - 161:18	Calls for speculation, F.R.E. 602; incomplete designation, omits answer;	152:15 - 153:3; 153:16 - 154:7; 155:6 - 155:21	SCOPE; F; LO
161:20 - 162:12	Calls for speculation, F.R.E. 602; incomplete designation, omits answer;	152:15 - 153:3; 153:16 - 154:7; 155:6 - 155:21	SCOPE; F; LO
163:22 - 164:23	Calls for speculation, F.R.E. 602; incomplete designation, omits answer;	152:15 - 153:3; 153:16 - 154:7; 155:6 - 155:21	SCOPE; F; LO
165:2 - 165:11	Calls for speculation, F.R.E. 602; incomplete designation, omits answer;	152:15 - 153:3; 153:16 - 154:7; 155:6 - 155:21	SCOPE; F; LO
165:22 - 166:1	Calls for speculation, F.R.E. 602; incomplete designation, omits answer;	152:15 - 153:3; 153:16 - 154:7; 155:6 - 155:21	SCOPE; F; LO

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
166:3 - 166:8	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	152:15 - 153:3; 153:16 - 154:7; 155:6 - 155:2;	SCOPE; F; LO
168:2 - 168:21	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	152:15 -153:3; 153:16 - 154:7; 155:6 -155:21	SCOPE; F; LO
168:22 - 169:14	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	152:15 - 153:3; 153:16 - 154:7; 155:6 - 155:21	SCOPE; F; LO
170:5 - 170:10	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.	152:15 - 153:3; 153:16 - 154:7; 155:6 - 155:21	SCOPE; F; LO
176:13 - 176:19	No tendency to make any fact more or less probable and the fact is not of consequence in determining the case, F.R.E. 401; further object on the grounds that its reception would be unfairly prejudicial, confusing, distracting, or a waste of time, F.R.E. 403.		
191:23 - 192:13		198:17 - 199:4	S

Plaintiffs' Deposition Designations	Defendants' Objections	Defendants' Counter Designations	Plaintiffs' Counter Objections
194:10 - 195:13	Lack of foundations/speculation, F.R.E. 602.	198:17 - 199:4	S
195:15 - 195:24		198:17 - 199:4	S
196:24 - 197:5		198:17 - 199:4	S

Exhibits Offered Through Deposition Designations

Witness / Deposition	Trial Ex.	Depo Tr.
Merritt Beaver (2/2022)	PX 028	170:18-172:24
Merritt Beaver (2/2022)	PX 022	176:4-176:21
Merritt Beaver (3/2022)	PX 097	275:11-275:16, 275:17-276:4
Merritt Beaver (3/2022)	PX 098	314:20-317:16
Merritt Beaver (3/2022)	PX 019	332:12-332:23
Merritt Beaver (3/2022)	PX 292	345:6-345:15
Merritt Beaver (3/2022)	PX 293	352:13-353:19
Eric Chaney	PX 110, p. 20	121:7-13
Eric Chaney	PX 110, p. 22	123:15-124:11, 124:13
Eric Chaney	PX 110, p. 23	127:10-128:7
Eric Chaney	PX 310	180:3-7
Alex Cruce	PX 358	51:2 - 53:1
Alex Cruce	PX 359	75:20 - 76:19
Dean Felicetti	DX 663	24:22-25:11
Dean Felicetti	PX 341	26:13-18
Dean Felicetti	PX 342	29:15-29:21
Dean Felicetti	PX 343	30:17-31:4
Dean Felicetti	PX 345	112:19-113:6; 113:9-113:14
Juan Gilbert	PX 063	57:19-58:2
David Hamilton	PX 032	116:22-118:4
David Hamilton	PX 036	125:10-127:15
David Hamilton	PX 096	158:22-23, 159:4-160:19
David Hamilton	PX 025	176:12-13, 176:19-20, 177:5-178:8.
David Hamilton	DX 527	53:7-54:2
Misty Hampton	PX 037	211:16-212:1
Misty Hampton	PX 038	214:15-215:1
Misty Hampton	PX 039	216:22-227:7
Misty Hampton	PX 110, p. 19	49:22-50:11
Misty Hampton	PX 111, pp. 3-9	87:9-14
Doug Logan	PX 324	75:10-13
Gabriel Sterling (10/2022)	PX 16	13:13-22
Gabriel Sterling (10/2022)	DX 337	29:5-29:23
Gabriel Sterling (10/2022)	PX 144	39:20-40:4
Gabriel Sterling (10/2022)	PX 84	51:7-22
Gabriel Sterling (10/2022)	PX 134	139:4-140:23
Gabriel Sterling	PX 182	209:6-209:12, 211:19-212:21, 216:19-

Witness / Deposition	Trial Ex.	Depo Tr.
(10/2022)		216:23
Gabriel Sterling (10/2022)	PX 136	219:16-219:17, 220:3-221:1
Gabriel Sterling (10/2022)	DX 349	233:15-233:16, 234:5-234:16
Gabriel Sterling (10/2022)	PX 140	243:9-245:1
Gabriel Sterling (10/2022)	PX 187	335:6-335:21
Gabriel Sterling (2/2022)	DX 307	9:8-9, 10:19-11:7, 11:15-20, 11:22-12:6
Gabriel Sterling (2/2022)	PX 503	152:7-152:19
Gabriel Sterling (2/2022)	PX 074	154:7-154:8; 154:18-154:22
Gabriel Sterling (2/2022)	PX 197	179:18-180:8
Gabriel Sterling (2/2022)	PX 198	223:12-223:20
Gabriel Sterling (2/2022)	PX 199	233:17-235:1
Stone	PX 318	101:8-17
Stone	PX 319	106:14-21
Stone	DX 552	146:7-147:12